

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:  
ALEXIS LEE ALLBROOKS**

**BANKRUPTCY NO. 19-52458-KMS**

**21<sup>ST</sup> MORTGAGE CORPORATION'S RESPONSE TO  
TRUSTEE'S MOTION TO DETERMINE FINAL CURE**

COMES NOW, 21<sup>st</sup> Mortgage Corporation ("21<sup>st</sup> Mortgage"), and files this its response to Trustee's Motion to Determine Final Cure ("Motion") [Dkt # 66], and in support hereof would state as follows:

1. The allegations set forth and contained in Paragraph 1 are admitted.
2. The allegations set forth and contained in Paragraph 2 are denied. 21<sup>st</sup> has not payment for February and March, 2025.

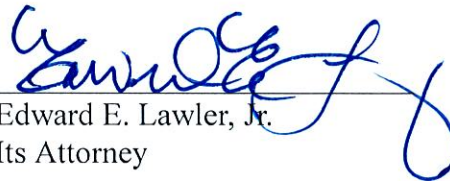
**WHEREFORE, PREMISES CONSIDERED**, 21st Mortgage Corporation prays that Trustee's Motion to Determine Final Cure be denied. 21<sup>st</sup> Mortgage requests the Court to grant such other relief as is necessary under the circumstances.

**DATED:** June 12, 2025.

Respectfully submitted,

21<sup>st</sup> Mortgage Corporation

By:

  
Edward E. Lawler, Jr.  
Its Attorney

Edward E. Lawler, Jr., MSB No. 1095  
Lawler Foreman PLLC  
Post Office Box 2488  
Ridgeland, MS 39158-2488  
Telephone (601) 572-8778  
Email: [elawler@lawlerforeman.com](mailto:elawler@lawlerforeman.com)

### CERTIFICATE OF SERVICE

I served a copy of the foregoing Response to Trustee's Motion to Determine Final Cure upon the following individuals:

Thomas Carl Rollins, Jr.  
The Rollins Law Firm, PLLC  
Post Box 13767  
Jackson, MS 39236

United States Trustee  
501 East Court Street, Suite 6-430  
Jackson, MS 39201

David Rawlings  
Chapter 13 Trustee  
Post Office Box 566  
Hattiesburg, MS 39403

Alexis Lee Allbrooks  
1626 Augusta Road  
Ellisville, MS 39437

by United States mail, postage prepaid, or by electronic notice, on June 12, 2025.

  
\_\_\_\_\_  
Edward E. Lawler, Jr.

FORM-B1908